

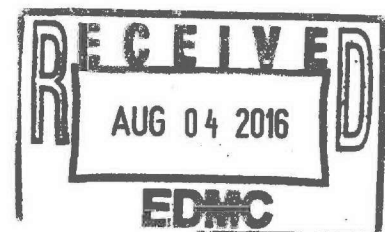
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M-045-82 Tier 1, 2, and 3 WMA C Closure Plan Submittal Milestone Meeting

Ecology Building

Richland, Washington

May 25, 2016

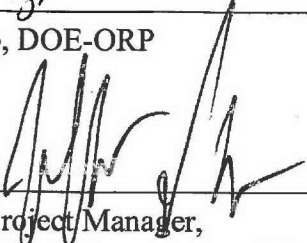


CONCURRENCE SIGNATURES

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting.

CJ12
Chris Kemp, DOE-ORP

Date: 8-4-2016


Jeff Lyon, Project Manager,
Washington State Department of Ecology

Date: 8-2-16

Date of Meeting: May 25, 2016

Purpose: Discussion of path forward to resolve the dispute regarding Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-045-82.

Location: Washington State Department of Ecology (Ecology) Conference Room 3A.

Attendees:

Jim Alzheimer – Ecology
Ryan Beach – ORP
James Hamilton-WRPS
Andrea Hopkins - WRPS
Chris Kemp – ORP
Jeff Lyon – Ecology
Dan Parker – WRPS
Rob Piippo - MSA
John Price – Ecology
Maria Skorska – Ecology
Mign Walmsley – Ecology
Cheryl Whalen – Ecology

Meeting Agenda:

- Status of Tier 1
- LFRG
- “Key Interfaces Supporting WMA C Closure and Corrective Action”- Figure
- EIS
- Next Steps

Synopsis:

An attendance sheet was circulated (Attachment 1). Following a safety topic discussion, John Price of Ecology opened the meeting with a discussion of the agenda and meeting purpose (Attachment 2). Concerning the first agenda item, Chris Kemp, Department of Energy – Office of River Protection (ORP), said ORP was not really sure of Ecology’s status on the Tier 1 submittal review. Mr. Kemp expressed concern that ORP’s previous understanding was that there was agreement between the agencies on the content of the Tier 1 Closure Plan.

Mr. Kemp stated that recent letters from Ecology including the April 11, 2016, letter (Attachment 3) indicate to ORP that the current serial/bifurcated approach for document submittal does not appear to work for Ecology. ORP is currently still working on a serial/bifurcated approach for submittal of documents supporting closure. ORP is open to doing things differently. However, given the characterization unknowns for elements of Waste Management Area (WMA) C, such as 241-C-301 Catch Tank, and the seven diversion boxes, it isn’t clear how a non-serial approach for Tier 3 Closure Plans would work. ORP desires to work

with Ecology on coordinated document submittals supporting closure and the development of the three tier closure plan. Also, given the division of scope between RL and ORP, and the current contracts and baselines, DOE cannot do what the April 11, 2016, letter requests at this point.

A discussion of the importance and schedule of the 200-BP-5 Operable Unit (200-BP-5) Remedial Investigation/Feasibility Study (RI/FS) was initiated by Ecology. ORP reminded the attendees that the 200-BP-5 RI/FS will not be ready in time to support the schedule for the Tiered Closure Plans. ORP expressed the concern that Ecology requires references in the closure plans from documents already published and the schedule for 200-BP-5 does not support this need. The 200-BP-5 FS and Record of Decision (ROD) are estimated to be completed in the 2022 timeframe. Mr. Kemp emphasized that if closure decisions must be coordinated with actions associated with groundwater, milestones on closure will be missed. Additionally, Mr. Kemp discussed the need for the *Clean Closure Practicability Demonstration for the Single-Shell Tanks* (DOE/ORP-2014-02) to be finalized and is waiting for comments from Ecology.

In response to a question from John Price to explain why ORP believed that groundwater information would need to be included in the Tier 1 Closure Plan based on Ecology's April 11, 2016, letter from Ecology to ORP. Mr. Kemp pointed out that in the April 11, 2016, letter, groundwater discussion was pervasive and several comments (e.g., general comment 1a, and specific comments 3b, 5, 6, and 10) which required that groundwater information be included in the closure plans were briefly discussed. Jeff explained that the letter asks that ORP and Ecology get together and start talking about the elements of the letter that were raised. Jim Alzheimer asked questions regarding the movement from closure to post-closure regarding performance standard, and integrating closure of WMA C with groundwater protection.

Mr. Kemp explained that the discussion of groundwater has influenced in a positive way an effort between RL and ORP to work in a coordinated fashion. He said that the groundwater pump and treat is a CH2M HILL Plateau Remediation Company and the Department of Energy – Richland Operations Office (RL) responsibility, while the deep vadose zone permitting actions are ORP's responsibility. Mr. Kemp then asked the point of the April 11, 2016, letter. Jeff Lyon responded that he would like to set up a meeting or a series of meetings to discuss the elements of the letter. Mr. Lyon then asked about the DOE Order 435.1 process and approvals regarding the LFRG, the WIR and the DOE Order 435.1 Closure Plans.

There followed a discussion of "ORP Update- Maya (sic) 12, 2016" (Attachment 4) including possible 200-BP-5 ROD impacts, groundwater standards, technology for technetium-99, flux calculations on 200-BP-5, and lining up 200-BP-5 and the WMA-C Corrective Measures Study (CMS) in terms of cumulative impacts. A discussion of the "roadmap" (figure page 5) followed with the caveat from Chris that the figure is a brainstorming figure for discussion. Following was a discussion of "Draft Milestone Dates and Changes From WMA C Closure Regulatory Documents Schedule" (Attachment 5).

Ecology asked about performance standards for 200-BP-5 and the time period for which the ground water was modelled. DOE then provided an explanation for the cumulative impact evaluation. After the 200-BP-5 model discussion, Ecology mentioned the difference between the

Composite Analysis (CA) and the Cumulative Impact Evaluation (CIE). DOE then provided an explanation for the CA and the CIE and their intended purpose.

DOE asked the status of the Ecology review of the practicability evaluation and asked for it to be approved stating DOE thought it was ready for approval.

The conceptual schedule for WMA A/AX IPA was then presented by ORP and discussed. (Attachment 6). A signature page is attached as Attachment 7.

Actions:

- Ecology will schedule an internal meeting to discuss consensus opinions.
- John Price will schedule a couple of meeting to discuss risk based closure decisions.
- The meeting the week of June 6, 2016 will be attended by Mike Cline (RL) and Ryan Beach acting for Chris Kemp. Mr. Kemp will be out that week.
- A follow-on meeting with Chris Kemp and Mary Burandt will be scheduled to discuss DOE/ORP-2014-02.

Attachments:

Attachment 1: Meeting Attendance Sheet (1 page)

Attachment 2: Agenda for Meeting, "Tier 1/2/3 Discussion, May 25, 2016 (1 page)

Attachment 3: Letter from Ecology (16-NWP-066) providing Ecology's comments on the Tier 1 Closure Plan – Single Shell Tank (SST) System (7 pages)

Attachment 4: Office of River Protection Update – May 12, 2016 (5 pages)

Attachment 5: Draft Milestone Dates and Changes from WMA C Closure Regulatory Documents Schedule (1 page)

Attachment 6: Waste Management Area A/AX Conceptual Performance Assessment Plan, Conceptual Schedule for WMA A/AX IPA (2 pages)

Attachment 7: Signature page (1 page)

Attachment 1: Meeting Attendance Sheet (1 page)

May 25, 2016

Tier 1/2/3 dispute

John Price Ecology

ROS Gilpin DO ~~WRPS~~

Cheryl Whelan Ecology

Austoker Ecology

Juan E. Bonds ORP

Dan PARKER WRPS

JEFF Layton Ecology

Jim Albrecht Ecology

James Hamilton WRPS

Chris Kamp DOE-ORP

Andrew Hopkins WRPS

Mary Maloney Ecology

Attachment 2: Agenda for Meeting, “Tier 1/2/3 Discussion, May 25, 2016 (1 page)

Tier 1/2/3 Discussion

May 25, 2016

Status of Tier 1 – discussion or questions

LFRG

“Key Interfaces Supporting WMA C Closure and Corrective Action” – figure

EIS

Next Steps

Attachment 3: Letter from Ecology (16-NWP-066) providing Ecology's comments on the Tier 1 Closure Plan – Single Shell Tank (SST) System (7 pages)



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 11, 2016

16-NWP-066

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Response Comments for the *Tier 1 Closure Plan Single-Shell Tank (SST) System*, RPP-RPT-58858, Revision 1

Reference: See page 2

Dear Mr. Smith:

Ecology recognizes and appreciates the submittal of the *Tier 1 Closure Plan SST System*, RPP-RPT-58858, Revision 1 (reference 1), in partial completion of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-045-82 requirements. This milestone, currently in dispute, requires the United States Department of Energy (USDOE) to: "Submit complete permit modification requests for Tiers 1, 2, & 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C." USDOE submitted only a Tier 1 Closure Plan SST System with references.

Ecology has determined that the Tier 1 Closure Plan SST System, RPP-RPT-58858, Revision 1, does not provide sufficient information to complete a modification to the Hanford Site-Wide Permit for the Single-Shell Tank System. Because these unfit-for-use tanks will continue to store a large volume of waste for a number of decades (Milestone M-045-00), the *Tier 1 Closure Plan SST System* must contain details of the information identified in HFFACO Appendix I (*SST System Waste Retrieval and Closure Process*) and information demonstrating tank waste will be safely managed during this extended closure period to ensure ongoing protection of human health and the environment (Washington Administrative Code 173-303-610(4)).

The enclosure provides comments based on our initial review, and identifies the subject matter required to complete the review and permit modification process included in HFFACO Appendix I, Section 9.2 (Document Review and Comment Process). Because Ecology finds the scope of the submitted Tier 1 Closure Plan SST System insufficient, our attached comments should not be considered a final review. Rather, comments are provided as an initial review of the information gaps we have identified for the Tier 1 Closure Plan SST System.

Also, because USDOE references the USDOE submittal of the *Clean Closure Practicability Demonstration for the Single-Shell Tanks*, DOE/ORP-2014-02, Ecology will provide a separate response letter to that submittal (reference 2).



Mr. Kevin W. Smith
April 11, 2016
Page 2

16-NWP-066

After USDOE has reviewed our comments, Ecology requests a meeting to further discuss our concerns, identify additional details of the information needed, and develop a path forward for finalizing the Tier 1 Closure Plan SST System and providing a complete permit modification submittal.

Please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914 to plan a meeting, or if you have questions.

Sincerely,



Jeffery Lyon
Tank Systems Operations and Closure Project Manager
Nuclear Waste Program

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Enclosure: Review Comments for Tier 1 Closure Plan Single-Shell Tank System

Reference 1: Letter 15-ECD-0042, dated September 30, 2015, "Submittal of the Tier 1 Closure Plan for the Single-Shell Tank System"

Reference 2: Letter 15-NWP-103, dated June 3, 2015, "Letter 14-ECD-0030, dated July 23, 2014, from K. W. Smith, USDOE-ORP, to J. A. Hedges, Ecology, "Transmittal of Clean Closure Practicability Demonstration for the Single-Shell Tanks, DOE/ORP-2014-02"

cc electronic w/enc:

Dennis Faulk, EPA
Ryan Beach, USDOE
Mary Beth Burandt, USDOE
Joanne Grindstaff, USDOE
Chris Kemp, USDOE
Jon Perry, MSA
Lucinda Borneman, WRPS
Neil Davis, WRPS
Jessica Joyner, WRPS
Mark Lindholm, WRPS
L. David Olson, WRPS
Dan Parker, WRPS
Paul Rutland, WRPS
Suzette Thompson, WRPS
Rebecca Wiegman, WRPS
Ken Niles, ODOE
Jim Alzheimer, Ecology
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Jeffery Lyon, Ecology

cc electronic w/enc:

Maria Skorska, Ecology
Mign Walmsley, Ecology
Cheryl Whalen, Ecology
Environmental Portal
Hanford Facility Operating Record
USDOE-ORP Correspondence
Control
WRPS Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Alyssa Buck, Wanapum
Russell Jim, YN
NWP Reader File

Enclosure - Review Comments on Tier 1 Closure Plan Single-Shell Tank System

1.1 GENERAL COMMENTS

The Tier 1 Closure Plan SST System must describe the following:

1. How closure of the SSTs and ancillary equipment will be integrated with:
 - a. Cleanup of contaminated soil and groundwater; (soil cleanup through Remedial Investigation/Corrective Measures Study process, and groundwater cleanup through a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Record of Decision);
 - b. Planning for integrating overall Central Plateau cleanup actions;
 - c. The Closure Plan SST System (Tiers 1, 2, and 3), and incorporation of these decisions in the Site-Wide Permit.
2. Results of the clean closure practicability demonstration for the single-shell tanks, and performance assessment (per HFFACO, Appendix I) in the Tier 1 Closure Plan SST System.
3. Processes described in the SST WMA C Resource Conservation and Recovery Act/CERCLA integration white paper.
4. How HFFACO Appendix H, Single Shell Tank Waste Retrieval Criteria Procedure will be implemented.
5. Other regulatory requirements for closure, and how they are met, including the High Level Waste-Waste Incidental to Reprocessing determinations for contaminated soils and tank residuals (HFFACO Appendix I, sections 2.5 and 3.1).
6. Given the extensive schedule for closure, information demonstrating USDOE has taken, and will continue to take, all steps to ensure threats to human health and the environment are prevented while closure proceeds.

1.2 SPECIFIC COMMENTS

1. USDOE submitted only the Tier 1 portion of the Closure Plan SST System (with references). Ecology considers the related SST System closure correspondence and other documentation, indicated in the list below, relevant to our review process. The items below should be included as reference material, and the Tier 1 Plan should include an explanation, context and basis for applicability of this information:
 - a. Letter dated August 15, 2006, from J. A. Hedges, Ecology, to R. J. Schepens, USDOE-ORP, "Letter 06-TPD-050, dated July 31, 2006, from R. Schepens, USDOE, to J. Hedges, Ecology, "Request for Temporary Suspension of Single-Shell Tank (SST) System Closure Plan Submittals"
 - b. Letter 04-TPD-092, dated September 28, 2004, from R. J. Schepens, USDOE-ORP, to M. A. Wilson, Ecology, "Submittal of Single-Shell Tank (SST) System Closure Plans to Fulfill Requirements for Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestones M-45-06B and M-45-06C"

- c. Letter dated September 13, 2004, from J. Lyon, Ecology, to R. J. Schepens, USDOE-ORP, "Single-Shell Tank Permit Application: Single-Shell Tank System Closure Plan, RPP-13774, Rev. 2," dated January 19, 2004"
 - d. Letter dated April 5, 2004, from J. Lyon, Ecology, to R. J. Schepens, USDOE-ORP, "Single-Shell Tank 241-C-106"
 - e. Letter 04-TPD-010, dated January 19, 2004, from R. J. Schepens, USDOE-ORP, to M. A. Wilson, Ecology, "Submittal of Single-Shell Tank (SST) System Closure Plan Revision 2"
2. Information identified for submittal in the Draft Hanford Facility Dangerous Waste Permit, Revision 9, SST System Closure Unit Group 4 chapter permit conditions is needed to support a complete permit modification request for incorporating the SST System into the Site-wide Permit. Some of the information is needed to inform closure decisions (e.g., process information). Some of the information requirements are needed in support of the extended closure period to ensure continued protection of human health and the environment from the unclosed but not operating tank systems (e.g., security, monitoring and inspections, training, preparedness and prevention). While some of this information is discussed generally in Section 1.1 of the Tier 1 Closure Plan, this information needs to be detailed and submitted for inclusion in the Site-wide Permit as part of the permit modification request.
 3. When the requirement for a Tier 1 Closure Plan was added to the HFFACO, there was an expectation that specific goals and cleanup actions would be clearly defined (coordinated and integrated) regarding closure of the SST System and associated groundwater units.
 - a. For the practicability demonstration (Clean Closure Practicability Demonstration for the Single-Shell Tanks, DOE/ORP-2014-02), it is important that USDOE provide a complete description of the evaluation and decisions for each WMA in the Tier 1 Closure Plan submittal.
 - b. The Tier 1 Closure Plan SST System must specifically provide a complete description of the coordination and integration for groundwater mitigation as described in the HFFACO, Appendix I. Without a proposed remedy for the 200-BP-5 and 200-PO-1 groundwater operable units (OUs), the Tier 1 SST System Closure Plan submittal must address how coordination and integration of groundwater cleanup with closure of the single-shell tank waste management areas (WMAs) will be conducted. Contamination from WMA C has already reached the groundwater in both the 200-BP-5 and 200-PO-1 groundwater OUs, and will continue to migrate to both of these groundwater units. Supporting closure documents (*such as Performance Assessments (PAs) and Remedial Feasibility Investigations (RFIs)*) must also contain detailed information on the groundwater impacts to 200-BP-5 and 200-PO-1 groundwater OUs from all WMA C sources (*such as soils, tank residuals, and ancillary equipment*). The HFFACO milestones M-015-21A and M-045-82, both due in 2015, would have provided an understanding of the coordination and integration for groundwater mitigation with an SST System closure. However, no proposed plans were submitted for milestone M-015-21A.

4. The 2015 Closure Plan must include definitions of key terms. Ecology recommends using "Key Definitions" from the 2004 Closure Plan, previously reviewed and accepted by Ecology.
5. The 2015 Closure Plan does not define the scope of an SST System closure, and seems to interpret closure of the SST System as not including treatment or removal of contaminated soils and groundwater. This approach is not consistent with the 2004 Closure Plan or Draft Revision 9, Site-Wide Permit condition V.4.G.1.a.
 - The SST permit condition V.4.G.1.a states: "*The Permittees will close the entire SST System, including tanks, ancillary equipment, contaminated soil, and contaminated groundwater, in accordance with the closure performance standards...*"
6. Ecology recognizes that groundwater remediation will be performed pursuant to a CERCLA ROD, developed for an associated groundwater operable unit. However, the Resource Conservation and Recovery Act closure process will be the principal regulatory mechanism for addressing environmental releases associated with the tank farms. Therefore, the 2015 Tier 1 SST System Closure Plan must include the groundwater operable unit process description that will address corrective measures for groundwater as applicable to releases of contamination from individual WMAs. This may include corrective measures specific to a WMA or a set of WMAs, along with closure and post-closure groundwater monitoring systems developed to monitor corrective measures for each WMA.
7. 2015 Closure Plan, Section 1, last paragraph. This section should be expanded to summarize the general content and incorporation of the Tier 1, Tier 2, and Tier 3 closure plans, similar to the Preface of the 2004 Closure Plan:
 - "*Tier 1 - Framework Plan for Single-Shell Tank System Closure: Referred to as the Framework Plan, ... provides a general overview of the single-shell tank system, a general description of the administrative framework and process for closure, including key definitions, and a description of the process for incorporating Tier 2 and Tier 3 with soil and groundwater corrective actions, single-shell tank closure performance standards, an overall closure schedule, and an overall description of the certification and post-closure process.*"
8. 2015 Closure Plan, page 2-2, last paragraph. Define the "operable unit" referenced in this paragraph. Also, revise this paragraph to reflect that contaminated groundwater must be addressed as part of SST System closure, according to the closure performance standard specified in the SST System permit (chapter), permit condition V.4.G.2 (Closure Performance Standards).
9. 2015 Closure Plan, Section 3.2, 2nd paragraph. Describe all applicable measures that will be used to protect human health and the environment, rather than referring to "previously described measures..."
10. 2015 Closure Plan, Section 3.2. Describe what groundwater-specific measures will be taken to protect human health and the environment.

11. 2015 Closure Plan, Section 3.2, page 3-3, does not include inspection procedures (see Site-Wide Permit and the 2004 Closure Plan).
12. The 2015 Tier 1 Closure Plan should address treatment, storage, and disposal of retrieved SST System waste. Include a discussion analogous to that found in the 2004 Closure Plan, Section 3.2.2, and a flow chart similar to Figure 3-2.
13. The 2015 Tier 1 Closure Plan should address management of waste generated during remediation and closure of tank systems, including applicability of land disposal restrictions regulations, similar to that found in Section 3.4 of the 2004 Closure Plan.
14. The 2015 Tier 1 Closure Plan should describe the SST System risk evaluation and performance assessment, analogous to that found in Section 4 of the 2004 Closure Plan (SST System Risk Evaluation). The two short paragraphs in Section 4 of the current (2015) closure plan are not an adequate substitute for the 26 pages of detailed discussion in the 2004 closure plan.
15. The 2015 Tier 1 Closure Plan should include a discussion of characterization of individual WMAs, and the SST System for closure, analogous to Section 5 in the 2004 Closure Plan.
16. Ecology recognizes that a schedule is currently under negotiation. However, the current (2015) Tier 1 Closure Plan needs to further include:
 - Discussion of planning and scheduling for SST closure actions;
 - A mechanism showing how to update schedules in closure plans;
 - A high-level description of the HFFACO M-45-00 Milestone series;
 - A flowchart illustrating implementation of these activities.

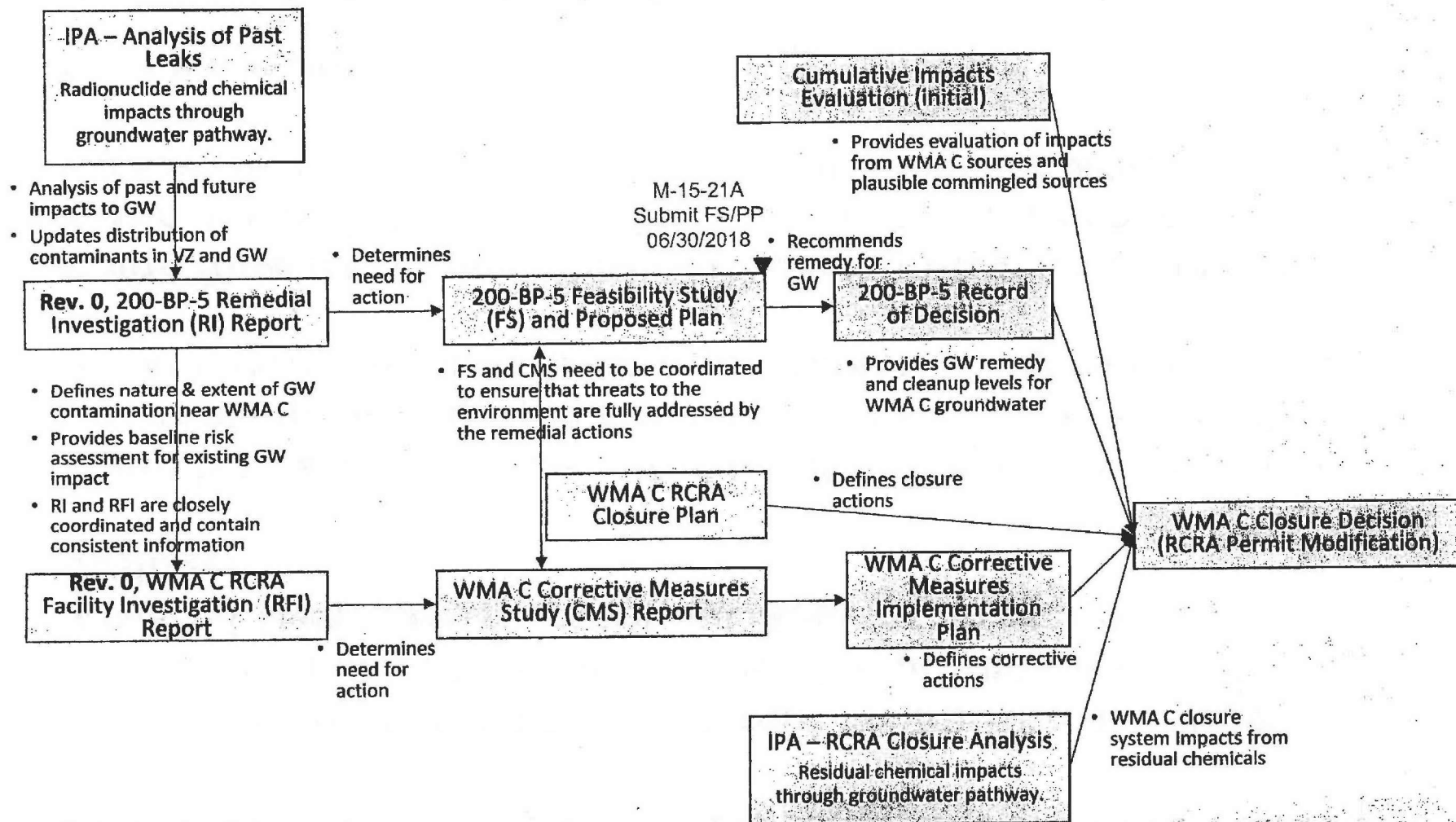
Attachment 4: Office of River Protection Update – May 12, 2016 (5 pages)

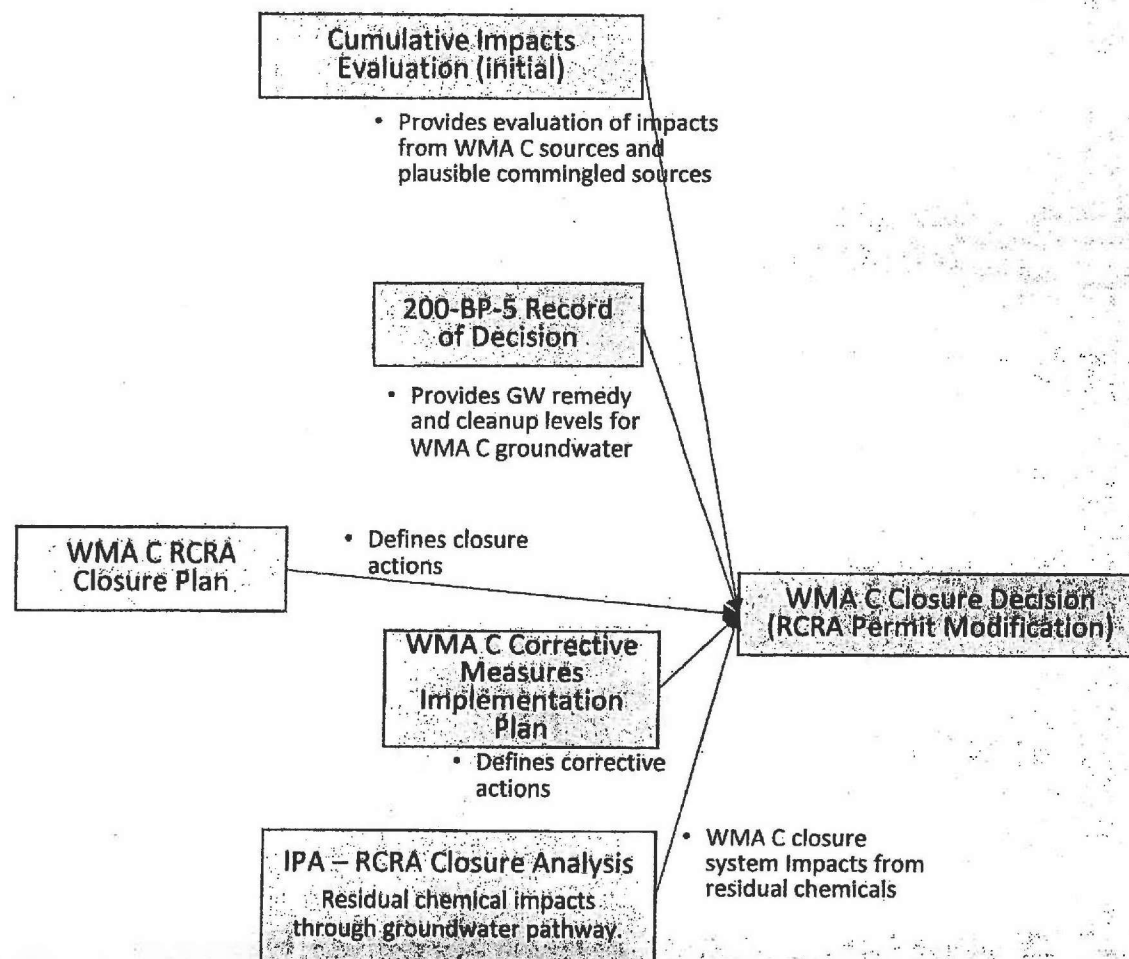


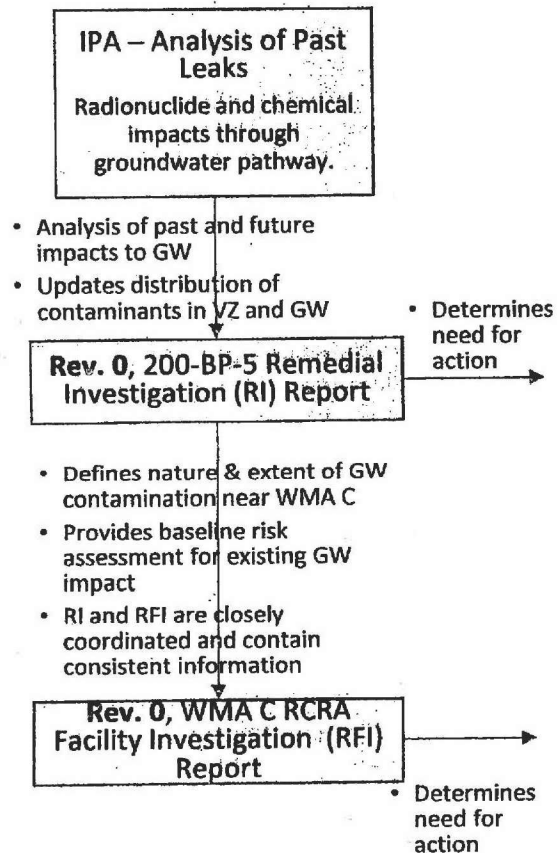
- **The scope and relationships among the analysis activities are well defined and meet the full set of requirements; but these have not been clearly communicated nor understood by Ecology.**
- **There isn't a clear consensus regarding the proper sequential relationship among all documents/analysis efforts; but we recommend a simultaneous or coordinated approach.**
- **Going forward, RL and ORP (and their contractors) need to put in place disciplined project management processes to ensure the necessary coordination of these activities.**
- **Path Forward:**
 - Resolve sequencing strategy and get Ecology input
 - Prepare materials for Ecology Workshop (e.g., analysis scope and timeframes)
 - Put project management processes in place to ensure coordination of these efforts



Key Interfaces Supporting WMA C Closure and Corrective Action







Options

- Independent (current approach)
- Sequential (RI then RFI)
- Simultaneous/coordinated

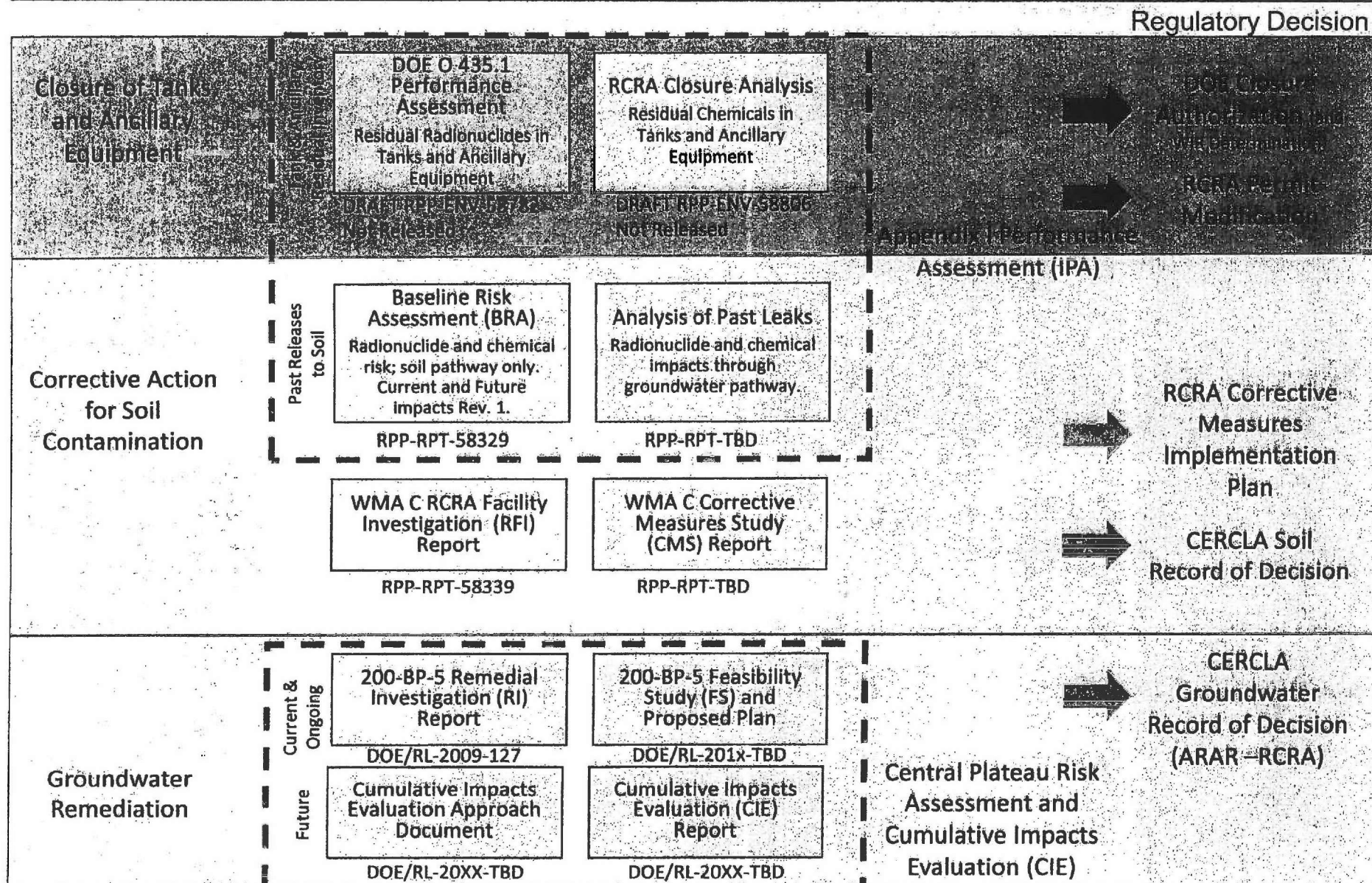
**WMA C Closure Decision
(RCRA Permit Modification)**



OFFICE OF

WMA C, 200-BP-5, and CIE Roadmap

Primary Reports, Analyses, and Decisions



**Attachment 5: Draft Milestone Dates and Changes from WMA C Closure Regulatory Documents
Schedule (1page)**

Draft Milestone Dates and Changes From WMA C Closure Regulatory Documents Schedule

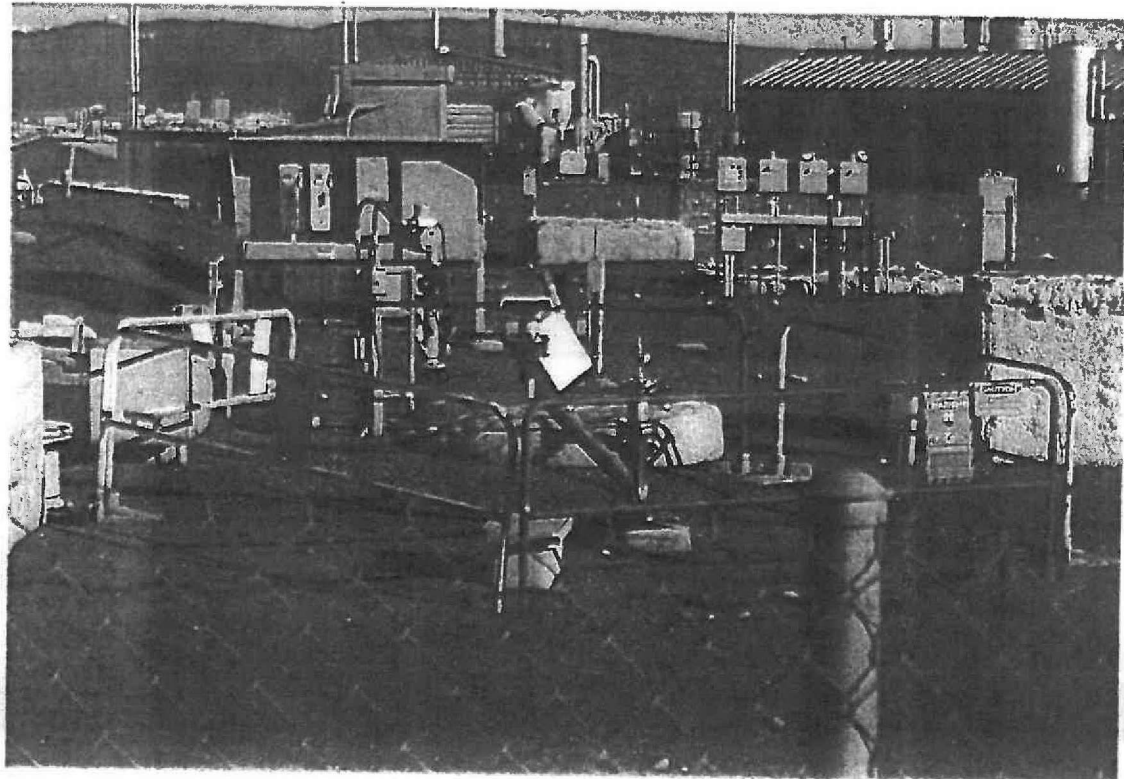
Schedule Line	Activity	HFFACO Milestone	Current Date	Proposed Date	Delta, Months
35	HQ Approve WIR	No	2/22/19	2/22/19	N/A
43	HQ Approve 435 Tier 1 WMAC	No	3/21/19	3/21/19	N/A
51	ORP Approve 435 Tier 2 C200s	No	N/A	5/21/19	N/A
52	ORP Approve 435 Tier 2 C101-6	No	N/A	10/2/20	N/A
53	ORP Approve 435 Tier 2 C107-12	No	N/A	2/18/22	N/A
54	ORP Approve 435 Tier 2 C301	No	N/A	5/22/23	N/A
55	ORP Approve 435 Tier 2 CR Vault	No	N/A	9/16/25	N/A
56	ORP Approve 435 Tier 2 Div Box & Misc	No	N/A	10/16/25	N/A
159	ORP submits WMA C IPA to Ecology	No	9/28/16	9/28/16	N/A
77	Submit WMA C RCRA Tier 2*	M-045-82	9/30/15	3/28/17	18 months
95	Submit C200s RCRA Tier 3*	M-045-82	9/30/15	3/28/17	18 months
112	Submit C101-106 RCRA Tier 3*	M-045-82	9/30/15	7/26/19	46 months
118	Submit C107-112 RCRA Tier 3*	M-045-82	9/30/15	1/15/20	52 months
122	Submit C301 RCRA Tier 3*	M-045-82	9/30/15	11/10/21	74 months
125	Submit CR Vault RCRA Tier 3*	M-045-82	9/30/15	4/18/24	103 months
128	Submit Ancil. RCRA Tier 3*	M-045-82	9/30/15	4/29/21	67 months
137	Submit RFI Rev 0 (see figure 9-1, Section 9 of the TPA)	M-045-61A	12/31/16	12/29/17	12 months
144	Submit CMS Rev A	No	N/A	12/20/18	N/A
146	Submit CMS Rev 0	M-045-61A	12/31/16	8/31/20	44 months
149	Corrective Measures Implementation Plan	M-045-62	6 months after approval of CMS	No change, 6 months after Line 124 (CMS Approved)	Same as M-045-61A
*Submittal date to start process in figure 9-2 in Section 9.0 of the TPA, to produce a complete permit modification					

**Attachment 6: Waste Management Area A/AX Conceptual Performance Assessment Plan,
Conceptual Schedule for WMA A/AX IPA (2 pages)**



washington river
protection solutions

Waste Management Area A/AX Conceptual Performance Assessment Plan





Conceptual Schedule for WMA A/AX IPA

	FY 2015				FY 2016	FY 2017				FY 2018				FY 2019			
	Q1	Q2	Q3	Q4		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Develop Data Packages and Hold Initial Scoping Session																	
Complete Scoping Sessions and Update Data Packages																	
Develop Conceptual Model																	
Develop Numerical and System Model Framework																	
Perform Scoping and Evaluation of Past Leak Impacts																	
Evaluate Tank Residual Impacts w/ Sensitivity Cases																	
Perform Uncertainty Analysis of Tank Residuals																	
Prepare IPA Documentation																	
ORP PA Review and Update																	
LFRG Review and Update																	
ORP Review and Release of Revision 0 of IPA																	

Revision 0
9/30/2019

Current schedule provides LFRG Review of PA in mid to late FY 2019
& Revision 0 of IPA for External Review in FY 2020